

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION  
Case No.: 9:23-cv-81150-RLR**

ANDREW TATE AND TRISTAN TATE,

Plaintiffs

vs.

EMMA GABBEY, et al.,

Defendants.

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**MOTION TO WITHDRAW AS COUNSEL**

The undersigned, pursuant to Local Rules 7.1(a)(1)(F) and 11.1(d)(3), hereby files this Motion requesting the Court permit Mary A. Norberg of Waugh, PLLC, to withdraw as as Co-Counsel for Defendants Jane Doe, John Doe, June Doe, and Liam Doe (collectively, the “Doe Defendants”), and states as follows:

1. Currently, the undersigned is listed as one of the counsel of record for the Doe Defendants on behalf of Waugh, PLLC, along with Christian W. Waugh.
2. At this time, the undersigned is in the process of moving to a new firm and will no longer be employed with Waugh, PLLC.
3. Christian W. Waugh, Esq., of Waugh, PLLC, as well as Danielle Bianculli, Esq., Benjamin W. Bull, Esq., Christen M. Price, Esq., Peter A. Gentala, Esq., and Victoria Hirsch, Esq., of the National Center on Sexual Exploitation will remain as counsel of record for the Doe Defendants.
4. The Doe Defendants consent to the undersigned’s withdrawal.

**WHEREFORE**, the undersigned respectfully requests the Court grant this Motion and

permit Mary A. Norberg, Esq., to withdraw as co-counsel for the Doe Defendants in this matter, removing Mary A. Norberg, Esq., as counsel of record.

**DATED:** January 10, 2024.

Respectfully submitted,

/s/ Mary A. Norberg  
Mary A. Norberg [FBN 1032028]  
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*Co-Counsel for Defendants*

#### **CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3), I hereby certify that I conferred with counsel for Plaintiffs, Thomas Maniotis, Esq., via email on January 4, 2024. Plaintiffs consent to the relief sought in this Motion.

/s/ Mary A. Norberg  
Mary A. Norberg [FBN 1032028]

#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Mary A. Norberg  
Mary A. Norberg [FBN 1032028]